

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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	:	
UNITED STATES OF AMERICA	:	
	:	
-v-	:	GOVERNMENT’S FORFEITURE
	:	<u>BILL OF PARTICULARS</u>
REGINALD FOWLER and	:	
RAVID YOSEF,	:	
OZ YOUSF	:	S3 19 Cr. 254 (ALC)
	:	
Defendants.	:	
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Pursuant to *United States v. Grammatikos*, 633 F.2d 1013, 1024 (2d Cir. 1980), the Government respectfully gives notice that the property subject to forfeiture as a result of the offenses described in Counts One and Five of the Superseding Indictment, and as alleged in the forfeiture allegation therein, includes the following:

- (a) Any and All funds seized on or about October 23, 2018 from HSBC Bank USA account 141000147, held by Global Trading Solutions LLC,
- (b) Any and All funds seized on or about October 23, 2018 from HSBC Bank USA account 697825922, held by Reginald D. Fowler;
- (c) Any and All funds seized on or about October 23, 2018 and on or about November 16, 2018, from HSBC Securities USA account HMB861668, held by Reginald D. Fowler;
- (d) Any and All funds seized on or about November 16, 2018 from HSBC Securities USA/Pershing LLC account HMB878886, held by Global Trading Solutions LLC;
- (e) Any and All funds held at Citibank, in account 207112962, held in the name of Global Trading Solutions LLC;
- (f) Any and All funds held at Citibank, in account 206618910, held in the name of Global Trading Solutions LLC;

- (g) Any and All funds held at Citibank, in account 207129503, held in the name of Global Trading Solutions LLC;
- (h) Any and All funds held at Citibank, in account 207132333, held in the name of Global Trading Solutions LLC;
- (i) Any and All funds held at Citibank, in account 207139809, held in the name of Global Trading Solutions LLC;
- (j) Any and All funds held at Citibank, in account 207139817, held in the name of Global Trading Solutions LLC;
- (k) Any and All funds held at Citibank, in account 207134933, held in the name of Global Trading Solutions LLC;
- (l) Any and All funds held at Citibank, in account 207132325, held in the name of Global Trading Solutions LLC;
- (m) Any and All funds held at Citibank, in account 207134958, held in the name of Global Trading Solutions LLC;
- (n) Any and All funds held at Citibank, in account 42024768923, held in the name of Reginald D. Fowler;
- (o) Any and All funds held at Citibank, in account 42001787749, held in the name of Reginald D. Fowler;
- (p) Any and All funds held at Citibank, in account 42024769061, held in the name of Reginald D. Fowler;
- (q) Any and All funds held at Citibank, in account 57457749, held in the name of Reginald D. Fowler;
- (r) Any and All funds held at Citibank, in account 9945530933, held in the name of Reginald D. Fowler;
- (s) Any and All funds held at Citibank, in account 207108689, held in the name of Eligibility Criterion;
- (t) Any and All funds on deposit at Deutsche Bank AG, in account 192057016802, held in the name of Global Trade Solutions GMBH;
- (u) Any and All funds held at Enterprise Bank, in account 1127548, held in the name of Eligibility Criterion;

- (v) Any and All funds held at Enterprise Bank, in account 1241367, held in the name of Eligibility Criterion;
- (w) Any and All funds held at Enterprise Bank, in account 1127564, held in the name of Eligibility Criterion;
- (x) Any and All funds held at Enterprise Bank, in account 1127652, held in the name of Eurocontrol;
- (y) Any and All funds held at Enterprise Bank, in account 1127644, held in the name of Eurocontrol;
- (z) Any and All funds held at Enterprise Bank, in account 1127177, held in the name of Global Trading Solutions LLC;
- (aa) Any and All funds held at Enterprise Bank, in account 1127193, held in the name of Global Trading Solutions LLC;
- (bb) Any and All funds held at Enterprise Bank, in account 1128700, held in the name of Reginald D. Fowler;
- (cc) Any and All funds held at Enterprise Bank, in account 1128727, held in the name of Reginald D. Fowler;
- (dd) Any and All funds held at Enterprise Bank, in account 1127599, held in the name of Spiral Global Development Corporation;
- (ee) Any and All funds held at Enterprise Bank, in account 1235784, held in the name of Spiral Sports II;
- (ff) Any and All funds held at JP Morgan Chase Bank, in account 296219550, held in the name of Global Trading Solutions LLC; and
- (gg) Any and All funds held at JP Morgan Chase Bank, in account 779558365, held in the name of Spiral Global Development;
- (hh) Any and All funds held at Suntrust Bank, in account 1000211769301, held in the name of NLE Consulting d/b/a Global Trade Solutions LLC;
- (ii) Any and All funds held at Bank of America, in account 898100395306, held in the name of NLE Consulting d/b/a Global Trade Solutions LLC;
- (jj) Any and All funds held at Wells Fargo Bank, in account 2514680467, held in the name of NLE Consulting d/b/a Global

Trade Solutions LLC;

- (kk) Any and All funds held at TD Bank, in account 4350649188, held in the name of NLE Consulting d/b/a Global Trade Solutions LLC;
- (ll) Any and All funds held at Canadian Imperial Bank of Commerce, in account CC001006882 5108411, held in the name of GTS – Canada Corporation;
- (mm) Any and All funds held at Canadian Imperial Bank of Commerce, in account CC001006882 0374016, held in the name of GTS – Canada Corporation;
- (nn) Any and All funds held at Canadian Imperial Bank of Commerce, in account CC001099702 4464710, held in the name of GTS – Canada Corporation;
- (oo) Any and All funds held at Canadian Imperial Bank of Commerce, in account CC001099702 4113411, held in the name of GTS – Canada Corporation;
- (pp) Any and All funds held at Canadian Imperial Bank of Commerce, in account CC001099702 4097513, held in the name of GTS – Canada Corporation;
- (qq) Any and All funds held at Canadian Imperial Bank of Commerce, in account CC001099702 4210719, held in the name of GTS – Canada Corporation;
- (rr) Any and All funds held at Santander UK PLC Bank, in account 00080753, held in the name of Global Management Solutions Limit’
- (ss) Any and All funds held at Santander UK PLC Bank, in account 10379431, held in the name of Global Management Group Ltd.;
- (tt) Any and All funds held at Santander UK PLC Bank, in account 10446319, held in the name of CIA Technology Global Ltd.;
- (uu) Any and All funds held at Santander UK PLC Bank, in account 10446322, held in the name of CIA Technology Global Ltd.;
- (vv) Any and All funds held at Caixa Bank, in account 0216076478170, held in the name of Global Trade AG;
- (ww) Any and All funds held at Caixa Bank, in account 0216076477370, held in the name of Global Trade AG;

- (xx) Any and All funds held at Caixa Bank, in account 0216076476570, held in the name of Global Trade AG;
- (yy) Any and All funds held at Caixa Bank, in account 0786071416230, held in the name of Global Trade AG;
- (zz) Any and All funds held at Caixa Bank, in account 0786071414070, held in the name of Global Trade AG;
- (aaa) Any and All funds held at Caixa Bank, in account 0216076111170, held in the name of Global Trade AG;
- (bbb) Any and All funds held at Caixa Bank, in account 0216075956230, held in the name of MOGW;
- (ccc) Any and All funds held at Caixa Bank, in account 0216076490070, held in the name of MOGW;
- (ddd) Any and All funds held at the Bank of the Philippine Islands, in account 2-5486163.306.001, held in the name of Eligibility Criterion;

((a) through (ddd) the "Specific Property")

Dated: New York, New York  
August 19, 2020

Respectfully Submitted,  
AUDREY STRAUSS  
United States Attorney

By   
SHEB SWETT  
Assistant United States Attorney  
Tel: (212) 637-6522